



Policy LP13 Accessibility and Transport Evidence Report

**Proposed Submission
April 2016**

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1. Introduction and Policy Context

Introduction

- 1.1 A joint Local Plan for the Central Lincolnshire area is being produced which will set the framework for how development will be considered across the districts of the City of Lincoln, North Kesteven and West Lindsey to 2036.
- 1.2 This Evidence Report (which is one of a collection) provides background information and justification for policy LP13, which relates to accessibility and transport.

National policy

- 1.3 The National Planning Policy Framework (NPPF) was published in March 2012 and the National Planning Practice Guidance (NPPG) was introduced in 2014 which offers 'live' government guidance.
- 1.4 Sustainable transport is referenced throughout the NPPF and the whole of section 4 is concerned with "Promoting Sustainable Transport". Reference is also made to transport in the section on "Plan-making". The following points are particularly relevant:
 - The stated Core Planning Principles in NPPF paragraph 17 include the following: planning should "actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable";
 - Section 4 (paragraphs 29 to 46) details the requirements of planning to maximise sustainable transport options and the need for and use of Transport Statements, Transport Assessments and Travel Plans;
 - Paragraph 58, in requiring robust and comprehensive policies setting out the quality of development that will be expected, state that development should aim to ensure that they "optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses... and support local facilities and transport networks"; and
 - In the section on plan-making, paragraph 156 it states that the Local Plan should include strategic policies to deliver "the provision of infrastructure for transport..."
- 1.5 The above NPPF policy has been taken into account in preparing the Local Plan as a whole, and policy LP13 in particular.

2 Central Lincolnshire Context in Relation to Policy LP13

- 2.1 Central Lincolnshire faces particular issues with meeting the sustainable transport requirements as set out in the NPPF. Large parts of Central Lincolnshire are rural and this inevitably results in a heavy reliance on car use for access to jobs, health, social and educational facilities whilst urban areas have issues with congestion at peak times, access and parking.

- 2.2 The 4th Lincolnshire Local Transport Plan (LTP) – see E040 in the Planning Policy Library - sets out the overall strategy and delivery arrangements for transport including supporting growth, tackling congestion, improving accessibility and creating safer roads for Central Lincolnshire. This is supported by the Lincoln, Gainsborough and Sleaford Transport Strategies – see E041, E042 and E043 in the Planning Policy Library - which set out a range of local proposals to help deal with congestion and improve transport options in the main urban areas. Both the LTP and Transport Strategies prepared by Lincolnshire County Council seek to build on innovative approaches to sustainable transport such as ‘Access Lincoln’ and ‘Interconnect’ services which, along with others, seek to improve bus travel, rail services and facilities and walking and cycling infrastructure.
- 2.3 Mouchel, working as part of the Lincolnshire County Council Highways Alliance, have produced a strategic level Lincolnshire Local Planning Tool (LLPT) which seeks to identify the potential impact of growth on the County’s highway infrastructure – see E044 in the Planning Policy Library. The LLPT seeks to assess the current and future capacity of the county’s highway infrastructure and identify the need for any targeted improvements should this be required to accommodate planned growth and as a basis for setting developer contributions to highway infrastructure through planning conditions, planning obligations and CIL. A subsequent Lower Tier assessment for the Lincoln Area has also more recently been produced (E044A)
- 2.4 An Infrastructure Delivery Plan (IDP) has been prepared alongside this Local Plan – see E010 in the Planning Policy Library - which sets out what, where and how infrastructure will be needed and delivered. The IDP identifies the type, scale and distribution of infrastructure required to support the level, location and phasing of development identified in the Local Plan. The IDP identifies the cost of infrastructure required to support the growth, proposed sources of infrastructure funding, known funding gaps, proposed delivery mechanisms and proposed delivery partners.
- 2.5 Infrastructure policies in the Local Plan, including those for transport, are also expected to be supplemented by the anticipated adoption of a Community Infrastructure Levy (CIL) in late 2016 or early in 2017 and supported by a Developer Contributions Supplementary Planning Document (SPD) which sets out the Central Lincolnshire Authorities’ approach to developer contributions. The SPD (a draft of which was consulted upon between 15 October and 25 November 2015 alongside the Further Draft Local Plan – see E012 in the Planning Policy Library) explains how developer contributions which are not provided for through CIL may be sought through the use of planning obligations, the types of contributions which may be sought and the basis for the charges. It also clarifies the relationship between planning conditions, planning obligations and CIL.
- 2.6 On sites proposed for allocation in this Local Plan, transport impacts have been taken into account where known and issues that may require further investigation identified in the relevant site allocation policies and supporting evidence.
- 2.7 The need for parking provision across the Central Lincolnshire area varies from settlement to settlement and from area to area within settlements. It will vary depending on the type, mix and use of any proposed development and of adjacent uses, the closeness of cycleways and footpaths and whether they lead to services and facilities, the availability and frequency of public transport, local car ownership levels and existing available car parking provision close to the development site. It is therefore not proposed to set specific

parking standards within this Local Plan but rather to allow for each proposal to be considered on a case by case basis. Developers will be required to consider user's needs, impact on neighbouring users and the safe and efficient use of the highway network and justify the level of parking provided and the design of such parking through a parking, Design and Access Statement, Transport Statement and/ or a Transport Assessment and Travel Plan depending on the scale and nature of the development.

- 2.8 The Central Lincolnshire Authorities working closely with partners and through the LTP, Transport Strategies, LLPT, IDP, CIL, SPD, guidance and advice by the local planning and highway authority on the level and detail of transport assessments, transport and design and access statements and travel plans and through development management decision will continue to ensure that all transport and access needs are taken into consideration at all stages of the development process.

3 Local Plan Policy: Preliminary Draft

- 3.1 The Preliminary Draft version of the Local Plan (published for consultation in October – November 2014) included a policy on transport (then known as LP12).
- 3.2 Comments received during the consultation on the Preliminary Draft version of the Local Plan were fairly evenly divided between expressions of support, objection and comment. Several objections concerned doubts about the deliverability of the stated aims and objectives of the Plan and referenced viability. Whilst the challenges facing Central Lincolnshire are acknowledged, difficult decisions and careful balancing of conflicting demands have to be made and it is felt that the policy, when supported by the LTP, Transport Strategies, LLPT, IDP, CIL, SPD and Whole Plan Viability ensure that we have explored all reasonable options to deliver optimum outcomes.
- 3.3 Some respondents objected to the focus of development on the three main centres feeling that this would increase congestion and cause rural areas to be neglected, that the section on transport had an urban bias that was anti car and by discriminating against rural development, it was not in conformity with NPPF para 29.
- 3.4 In response, the level and distribution of growth is covered by policies LP2 and LP3 and, whilst the focus is on Lincoln, Gainsborough and Sleaford, which have the greatest capacity to absorb large scale development and have the services, facilities and infrastructure to support them, Central Lincolnshire's rural areas are not neglected. Reasonable and appropriate development is encouraged in all settlements whilst being mindful of the core sustainability principles of the NPPF and is covered in more detail in policies LP2, LP4, LP51, LP52, LP53, LP55 and Appendix B. The Local Plan seeks to locate development in areas that have the easiest access to a range of services and facilities therefore reducing the need to travel and located in areas that maximise the opportunity to use sustainable modes of transport, both of which accord with overall sustainable development principles of the NPPF and particularly with the sustainable transport principles in section 4 – Promoting Sustainable Transport.
- 3.5 In addition, there was support for improving road infrastructure, but objection to all other points in the policy were expressed. In response, amendment of the policy to reflect this would be contrary to the sustainability principles of the NPPF, would be unrealistic and

undeliverable and does not result in inclusive communities by failing to consider the needs of those without access to motorised vehicles.

- 3.6 The cumulative impact of smaller developments and impacts beyond the boundaries of Central Lincolnshire were mentioned. In response, the transport policy covers all development proposals and evidence that its requirements have been considered are expected to be demonstrated in design and access statements, transport statements, transport assessments and/ or travel plans. High level cumulative impacts and cross boundary issues have been assessed by the LLPT and other supporting evidence for the Local Plan. They are also taken into consideration as part of the development management process.
- 3.7 Some objected to the inclusion of a reference to waterways as it was not felt that they could be seen as a realistic option for commuters, whilst others welcomed reference to them and felt that further information and details should be given of the role that waterways do and could play.

4 Local Plan Policy: Further Draft

- 4.1 Improved wording and clarification which were added to the policy or supporting text for the Further Draft stage wherever possible, to address comments raised at the Preliminary Draft stage. These include reference to park and ride facilities in the Lincoln area, transport interchanges, traffic calming initiatives, parking provision for powered two wheelers, that consideration is given to refuelling infrastructure for low and ultra-low emission vehicles and that all rail infrastructure and potential future investments are noted. The policy and supporting text were also amended to clarify the role and function that waterways do and can play in providing a mix of transport solutions, particularly for freight movement, as recreation and leisure routes and as sustainable transport corridors linked to cycleways and footpaths.
- 4.2 The Further Draft version of the Local Plan was published for consultation in October – November 2015.
- 4.3 Various comments were received during the Further Draft consultation strongly supporting or broadly supporting the policy or various elements of it, particularly:
- the need for travel plans;
 - improvements to the Lincoln/ Gainsborough/ Sheffield train service;
 - improved road connectivity across the River Trent;
 - bullet points complimenting the aims of the Central Lincolnshire Green Infrastructure Study;
 - recognitions of the rural nature of the area;
 - improvement of rural roads;
 - flexible approach to parking and transport issues;
 - requirement for safe public rights of way and cycle paths as part of development;
 - improved parking;
 - that development should not be granted if it has adverse transport implications; and
 - that allowance be made for low and ultra-low emission vehicles, in accordance NPPF para 35.

- 4.4 Comment was made that development proposed may have an adverse impact on the A46 between Lincoln and Newark and that further work is needed to assess implications and possible improvements and that development or road infrastructure should not give rise to the need for an Air Quality Zone or make an existing one worse.
- 4.5 Several comments were made on existing transport infrastructure inadequacies and various detailed suggestions were made about specific improvements to:
- the road network (particularly for HGV's) including the dualling of some roads;
 - parking;
 - rail (services and stations);
 - public transport (especially in the evenings and to and from strategic employment sites);
 - footpaths; and
 - cycle way infrastructure,
 - several park and ride sites,
 - a link between Gainsborough Central and Lea Road stations; and
 - a 2nd River Trent road bridge.
- 4.6 It was felt by some that there was insufficient reference to Lincoln's Eastern and Southern Bypasses, specific park and ride sites and East-West Link, the A159, A631 and their importance. There was concern that the policy did not reference viability and that the policy as written could add a further cost burden to developers particularly when asking for design and access statements for all developments, in seeking that allowance be made for low and ultra-low emission vehicles and in stating that planning permission will not be granted for development that has adverse transport implications unless it can be mitigated, stating that planning obligations need to meet legal and policy tests and suggesting that this may be contrary to the NPPF or other guidance.
- 4.7 There was concern that whilst the aims of the policy was 'laudable' without specific details, clear strategies and indications of how proposals may be funded, they may not be realised; that aspirational road improvements should be referenced and proposals to alleviate the issues at the Lincoln Station Road/ Doddington Road/ Skellingthorpe Road level crossing should be put forward and there was felt to be a need for a LTP4, more up to date transport reviews and detailed studies to support the policy or detailed proposals.

5 Local Plan Policy: Proposed Submission

- 5.1 Policy wording and supporting text have been reordered, compared with the Further Draft, to emphasise the importance of incorporating sustainable transport in accordance with NPPF guidance and supporting evidence. Of the detailed comments made at the Further Draft Stage regarding omissions or corrections or suggestions for improved wording and clarification, these have been added to the policy or supporting text wherever considered possible and necessary. Many comments such as those relating to how proposals are to be funded and viability assessment are covered by other supporting documents as stated above.

6 Alternative Reasonable Options

- 6.1 The following alternative options have been considered for this policy (**Option 1** is the preferred policy approach which has been included in the Proposed Submission version of the Local Plan).
- 6.2 **Option 2:** To have no local policy (or associated evidence) on transport but to rely on national policy. However, considering the importance of transport to the delivery of sustainable development, this approach is felt to provide insufficient policy framework and not to reflect the particular character, problems and potential solutions for Central Lincolnshire. The NPPF is also quite clear in stating the role of Local Plans in delivering sustainable development and the importance of planning policies in promoting sustainable transport.
- 6.3 **Option 3:** To have no specific transport policy, but rely on transport requirements for each site to be covered through allocation policies. This would ensure that transport is identified and provision coordinated, however, this option on its own would restrict identification and provision to only those sites recommended for allocation in the Local Plan. The Local Plan only seeks to allocate sites for 25 or more dwellings, therefore all sites below this threshold would not be referenced nor any settlements that would not be expected to accommodate larger development sites. It would also not allow for windfall sites other than through the development management process or the cumulative impact of smaller sites. In addition, this option would be extremely resource intensive, as a full appraisal of all development sites and their infrastructure needs would be necessary. This is inappropriate for a strategic policy document such as a Local Plan. Overall, this option is therefore rejected.

7 Conclusion

- 7.1 This Evidence Report demonstrates the rationale for the proposed policy as contained in the Proposed Submission Local Plan April 2016. We hope this helps demonstrate how we have responded to comments received during the Preliminary Draft and Further Draft consultation, as well as how the latest evidence and national guidance has been taken into account.